

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

Robert D. Curtis  
Kim J. Curtis

Case No. 16-32241-KRH

Debtor(s)

Chapter 13

4621 Treely Road  
Chester, VA 23831

Last four digits of Social Security or Individual Tax-payer  
Identification (ITIN) No(s)., (if any): 2502, 7153

**NOTICE OF MOTION**

Debtor(s), by counsel, have filed papers with the court to Extend the Automatic Stay.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before **May 30, 2016** (14 days), you or your attorney must:

- ☒ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad St.  
Richmond, VA 23219

You must also mail a copy to:

Winslow & McCurry, PLLC  
1324 Sycamore Square Ste. 202C  
Midlothian, VA 23113

Colonial Heights, VA 23834

- ☐ Attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☒ Attend the hearing on the motion (or objection) scheduled to be held **June 1, 2016** at **12:00 pm** the United States Bankruptcy Court, 701 E. Broad St, Courtroom 5000, Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: May 16, 2016

/s/ Christopher M. Winslow  
Christopher M. Winslow, Esq.#76156  
Winslow & McCurry, PLLC  
1324 Sycamore Square Ste. 202C  
Midlothian, VA 23113  
Ph: (804) 423-1382  
Counsel for Debtor(s)

#### Certificate of Service

I hereby certify that I have, this May 16, 2016, mailed or delivered by electronic means a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Christopher M. Winslow  
Counsel for Debtor(s)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

Robert D. Curtis  
Kim J. Curtis

Debtor(s)

Case No: 16-32241-KRH  
Chapter 13

**MOTION TO EXTEND THE AUTOMATIC STAY AND  
MEMORANDUM IN SUPPORT THEREOF**

**COMES NOW** the Debtor(s), by counsel, and offer the following Memorandum in Support of Debtor(s) Motion to Extend Automatic Stay:

**JURISDICTION**

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §1334 and 157 in that this action arises in and relates to the bankruptcy case of the Debtor(s).
2. This proceeding is a core proceeding under 28 U.S.C. §157(b)(2)(A), (B), (K), and (O).
3. Venue is proper pursuant to 28 U.S.C. §1409.

**BACKGROUND FACTS**

4. On 5/3/2016 (hereinafter the "Petition Date") , the Debtor(s) filed in this Honorable Court a petition for relief under Chapter 13 of the Bankruptcy Code, 11 U.S.C. § 1301 et seq. (the "instant case").
5. Suzanne E. Wade was appointed to serve as Chapter 13 trustee in this case (the "Trustee").
6. Within the year prior to filing the instant case, Debtor(s) have been Debtor(s) in one (1) pending Chapter 13 bankruptcy case (the "previous case"), which was filed on 9/9/2014 and dismissed on 4/15/2016. (Case No. 14-34870-KRH).
7. The previous case was dismissed by the court for default in making payments under the Plan.

### **FACTS OF THE INSTANT CASE**

8. In the instant case, Debtor(s) have proposed a Chapter 13 Plan (the “Plan”) that commits to pay the Trustee all projected disposable income, \$200.00 for 5 months then \$1,315.00 per month, for a period of 53 months. Other than administrative expenses, the Plan proposes the following:

- a. To pay the secured claim of \$9,560.00
- b. To pay to the priority unsecured creditors \$46,000.00
- c. To pay to the priority unsecured creditors \$1,170.00
- d. To pay a dividend to non-priority unsecured creditors of 1.51%, which claims are estimated to be approximately \$139,600.90.

### **DISCUSSION**

9. Because the instant case was filed within one (1) year of the dismissal of the previous case, the automatic stay will expire in the instant case on 6/3/2016, unless the Court extends the automatic stay pursuant to 11 U.S.C. §362 (c)(3)(A) and (B).

10. Pursuant to the provisions of the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (“BAPCPA”), the Debtor(s) must demonstrate to the Court that the instant case was filed in good faith in order to obtain an extension of the automatic stay pursuant to 11 U.S.C. §362 (c)(3)(B).

11. If the Court finds grounds for presuming the instant case was filed “not in good faith” §362(c)(3)(C) would impose a burden on Debtor(s) to overcome such presumption and prove good faith by clear and convincing evidence. If, however, the Court finds no grounds for presuming the instant case was filed “not in good faith,” Debtor(s) must merely prove good faith by a preponderance of the evidence. In re Havner, 336 B.R. 98, 103 (Bankr. M.D.N.C. 2006); In re Ball, 336 B. R. 268, 273 (Bankr. M.D.N.C. 2006)

12. Within the context of motions to continue the automatic stay pursuant to §362(c)(3), In re Chaney, 362 B.R. 690, 694 (Bankr. E.D. Va. 2007) instructs that the term “good faith” was defined judicially in the Fourth Circuit by Deans v. O’Donnell,

692 F.2d 968, 972 (4<sup>th</sup> Cir. 1982), further refined by Neufeld v. Freeman, 794 F.2d 149, 152 (4<sup>th</sup> Cir. 1986), and left unchanged by Congress when it created §362(c)(3). Chaney at 694.

13. Pursuant to Neufeld v. Freeman, good faith determinations require courts to consider, *inter alia*, “the percentage of proposed repayment, the Debtors’ financial situation, the period of time the payment will be made, the Debtors’ employment history and prospects, the nature and amount of unsecured claims, the Debtors’ past bankruptcy filings, the Debtors’ honesty in present facts, and any unusual or exceptional problems facing the particular Debtors.” Id. at 152, *citing* Deans v. O’Donnell, 692 F.2d 968, 972 (4<sup>th</sup> Cir. 1982). The focus of the inquiry is “to determine whether or not, considering ‘all militating factors,’ there has been ‘an abuse of the provisions, purpose, or spirit’ of Chapter 13 in the proposal or plan.” Neufeld, 794 F.2d at 152, *citing* Deans at 972 and *quoting* 9 Collier on Bankruptcy 9.20 at 319 (14<sup>th</sup> ed. 1978).

14. In order to apply the Fourth Circuit’s definition of good faith in determining whether the automatic stay should be extended pursuant to §362(c)(3),

“the court must be satisfied that the plan in the new case will succeed where the plan in the prior case did not. Usually this will require a find that some change in the financial or personal affairs of the debtor has occurred that will allow the debtor to perform under the terms of the plan in the new case. But the inquiry does not end there. The court needs to determine that the repetitive filing does not violate the spirit of the Bankruptcy Code. The new case must not be a ploy to frustrate creditors. It must represent a sincere effort on the part of the debtor to advance the goals and purposes of chapter 13”

Chaney at 694.

### **ARGUMENT**

15. In the case *sub judice*, there is a presumption that the instant case was filed “not in good faith” as to all creditors. Therefore, Debtor(s) must prove by clear and convincing evidence that the instant case was filed in good faith.

16. In the instant case, the Debtor(s) have acted in good faith, and Debtor(s) Requests that the Court grant an extension of the automatic stay as to all creditors, as to Debtor(s) and Debtor(s)’ property, and as to the property of the estate for the duration of the instant case. In support thereof, Debtor(s) submit an Affidavit, which is attached hereto as Exhibit “A” and incorporated hereby by reference thereto.

17. Applying the Neufeld factors to the Debtor(s)' circumstances and to this case leads to the following conclusions:

- a. *Percentage of proposed repayment* – The Plan proposes to pay a dividend of 1.51% to non-priority unsecured creditors. Such creditors would receive a dividend of 0% if Debtor(s) were to file a Chapter 7 bankruptcy case. Application of this factor favors a finding of good faith.
- b. *Debtors' financial situation* – The Debtors' financial situation is now sufficient to allow them to maintain an average standard of living for themselves, and to complete the terms of the Chapter 13 Plan.
  - (1) Debtor(s) have income from photography and event planning.
  - (2) Debtor(s) expect their income to increase within the next year due to wife seeking additional employment in real estate.

Furthermore, they have no extraordinary expenses and are not maintaining any expenses that are not necessary for their maintenance and support. Application of these factors favors a finding of good faith.

- c. *Period of time payment will be made* – The period of time in which payments will be made is reasonable and is based upon the Debtors' best efforts. Application of these factors favors a finding of good faith.
- d. *Debtors' employment history and prospects* – The Debtor(s)' income sources demonstrates that the proposed Chapter 13 Plan is feasible and in good faith. Application of these factors favors a finding of good faith.
- e. *Nature and amount of unsecured claims* – Likewise, the nature and amount of the Debtors' unsecured debt demonstrates their good faith.

(1) Debtor(s) unsecured, non-priority debts are estimated to be approximately \$87,030.90 and are proposed to be repaid at 1.51%.

- f. Debtors' past bankruptcy filings* - The instant Motion is required due to the fact that the Debtors have filed more than one (1) bankruptcy case. However, the Debtors' bankruptcy history does not indicate a lack of good faith. The Affidavit attached hereto as Exhibit "A" describes fully the reasons that the previous case was dismissed. Debtor(s) incorporate such explanation herein by this reference. Debtor(s)' hardships do not indicate an abuse of the bankruptcy system; rather, they indicate an honest but thus far unsuccessful attempt to financially reorganize. Application of this factor favors a finding of good faith
- g. Debtors' honesty in representing the facts* – The Debtor(s) have fully disclosed all assets, liabilities, and pertinent information regarding their personal and financial affairs. Application of this factor favors a finding of good faith.
- h. Any unusual or exceptional problems facing the particular Debtors* – There are no unusual or exceptional problems facing the Debtor(s). Application of this factor favors a finding of good faith.

18. Debtor(s) assert that the instant case does not "violate the spirit of the Bankruptcy Code" and it is not "a ploy to frustrate creditors"; rather, it represents "a sincere effort on the part of the Debtor(s) to advance the goals and purposes of chapter 13". See Chaney at 694. In support hereof, Debtor(s) assert the following additional arguments:

- a. The timing of the petition* - Between the dismissal of the previous case and the instant case, Debtor did not act in a manner so as to purposely delay payment of debts and did not delay in filing the instant case so as to intentionally frustrate creditors. Debtor(s)' actions in this regard indicate an intent to use the bankruptcy system to resolve debts in an

appropriate manner. Application of this factor favors a finding of good faith.

- b. *How the Debt(s) arose* – The debts in this case arose primarily over a period of time extending back several years. The debts were not the result of misuse of credit or luxury spending; rather, they arose as a result of ordinary living expenses that Debtor(s) became unable to repay. Application of this factor favors a finding of good faith.
- c. *The Debtor's motive in filing the petition* – Debtor(s)' motive in filing this case is to apply best efforts to repay creditors and receive a fresh start through bankruptcy. Application of this factor favors a finding of good faith.
- d. *How the Debtor's actions affected creditors* – The Plan provisions and treatment of creditors are generally described in paragraph 8, *supra*. This factor will rarely favor a debtor as to the finding of good faith, because “filing for bankruptcy relief will almost always prejudice one's creditors.” Galanis, 334 B.R. at 696.
- e. *Changes in circumstance and ability to complete this case* – The Affidavit attached hereto as Exhibit “A” describes fully the Debtor(s)' changes in circumstances and explains both the legitimate bases for the filing of this case as well as the Debtor(s)' ability to complete this case. Debtor(s) incorporate such explanations herein by this reference. Application of this factor favors a finding of good faith.

WHEREFORE, the Debtors respectfully requests this Honorable Court to enter an Order extending the automatic stay as to all creditors, as to Debtor(s) and Debtor(s)' property, and as to the property of the estate for the duration of the instant case, and for such other and further relief as to the Court shall be deemed appropriate.

Respectfully submitted,  
Robert D. Curtis  
Kim J. Curtis

By: /s/ Christopher M. Winslow, Esquire

Christopher M. Winslow

Winslow and McCurry, PLLC  
1324 Sycamore Square  
Ste. 202C  
Midlothian, VA 23113  
Phone: (804) 432-1382  
Fax: (804) 432-1383

**CERTIFICATE OF SERVICE**

I certify that on May 16, 2016, a copy of this Memorandum in Support of Debtor(s)' Motion to Extend the Automatic Stay was mailed via first-class mail, postage full pre-paid, to the Chapter 13 Trustee, Suzanne E. Wade, P.O Box 1780 Richmond, VA 23218 the United States Trustee, 701 E. Broad Street, Suite 4304, Richmond, VA 23219 and all creditors as set forth on the attached mailing matrix.

/s/ Christopher M. Winslow  
Christopher M. Winslow, Esquire  
Counsel for Debtor(s)

**LIST OF CREDITORS**

**Affiliated Dermatologists**  
of Virginia  
7813 Shrader Rd.  
Henrico, VA 23294-0000

**Alcoa Billing**  
3429 Regal Drive  
Alcoa, TN 37701-0000

**Alcoa Billing Center**  
3429 Regal Drive  
Alcoa, TN 37701-0000

**American Credit Bureau**  
2755 S Federal Hwy  
Boynton Beach, FL  
33435-0000

**American Medical Collection**  
2269 S. Saw Mill  
River Road  
Building 3  
Elmsford, NY 10523-0000

**American Medical Lab Corp**  
P.o. Box 2240  
Burlington, NC  
27216-0000

**Andrea Gonzaliz, M.D.**  
13700 St. Francis  
Blvd.  
Suite 505  
Midlothian, VA  
23114-0000

**Appomattox River Medical**  
8002 Discovery Dr.  
Suite 311  
Henrico, VA 23229-0000

**Appomattox River Medical**  
Hopewell Medical Center  
815 W. Poythress St.  
Hopewell, VA 23860-0000

**Aspen Collections**  
P.O. Box 10689  
Brooksville, FL  
34603-0000

**Astoria Federal Savings & Loan Association**

1 Corporate Dr. Ste.  
360  
Lake Zurich, IL  
60047-0000

**AT & T**  
P.O. Box 1954  
Southgate, MI 48195-  
0000

**Bank of America**  
P.O. Box 26078  
Greensboro, NC  
27420-0000

**Barclays Bank**  
**Delaware**  
125 S West St  
Wilmington, DE  
19801-0000

**Bby/Cbna**  
50 Northwest Point  
Road  
Elk Grove Village, IL  
60007-0000

**Bcc Financial**  
**Management Srv.**  
3230 W Commercial  
Blvd Ste 200  
Fort Lauderdale, FL  
33309-0000

**BetterMeds Urgent**  
**Care**  
P.O. Box 6341  
Richmond, VA  
23230-0000

**Bk Southsi**  
Po Box 40  
Carson, VA 23830-  
0000

**Bolling Brook**  
**Properties**  
P.o. Box 732  
Chesterfield, VA

23832-0000

**Bon Secours**  
P.O. Box 28538  
Richmond, VA  
23228-0000

**Bon Secours St.**  
**Francis Med Ctr**  
c/o Patrick F. Heinen,  
Esq.  
Spinella, Owings &  
Shaia, P.C.  
8550 Mayland Drive  
Richmond, VA 23294

**Cac Financial Corp**  
2601 Nw Expwy  
Oklahoma City, OK  
73112-0000

**Cap One**  
P.O. Box 85520  
Richmond, VA  
23285-0000

**Cap1/Bstby**  
26525 N Riverwoods  
Blvd  
Mettawa, IL 60045-  
0000

**Capital Recovery V,**  
**LLC**  
c/o Recovery  
Management Sys.  
25 SE 2nd Avenue  
Ste. 1120  
Miami, FL 33131-  
0000

**Caudle & Ballato**  
3123 West Broad  
Street  
Richmond, VA  
23230-0000

**Cawthorn,**  
**Deskevich & Gavin**

9701 Metropolitan Ct.  
Ste. C  
Richmond, VA  
23236-0000

**Central Florida**  
**Pathology Asso**  
P.O. Box 140987  
Pomona Park, FL  
32181-0000

**Chatham Hair**  
**Design**  
417 Pratt St.  
Fredericksburg, VA  
22405-0000

**Chesterfield County**  
**- Taxes**  
Richard A. Cordle,  
Treasurer  
P.O. Box 26585  
Richmond, VA  
23285-0088

**Chesterfield Fire &**  
**EMS**  
Post Office Box 70  
Chesterfield, VA  
23832-0000

**Citgo/Cbna**  
Po Box 6497  
Sioux Falls, SD  
57117-0000

**City of Richmond**  
Collections  
Department  
Post Office Box  
26505  
Richmond, VA  
23216-0000

**City of Richmond**  
**Citations**  
900 E. Broad Street  
Collection Div - Rm

102  
Richmond, VA  
23219-0000

**CJW Medical  
Center**

Post Office Box  
99008  
Bedford, TX 76095-  
0000

**Clean Care**

15600 Jefferson Davis  
Hwy  
Colonial Heights, VA  
23834-0000

**CMRE Financial  
Services, Inc.**

3075 E. Imperial Hwy  
# 200  
Brea, CA 92821-0000

**Colonial Heights  
Fire & EMS**

P. O. Box 62349  
Virginia Beach, VA  
23462-0000

**Colonial Heights  
Medical Ctr**

3512 Boulevard  
Colonial Heights, VA  
23834-0000

**Comcast**

PO BOX 3002  
Southeastern, PA  
19398-0000

**Comenity  
Bank/Dtyfr.Cm**

Po Box 182789  
Columbus, OH  
43218-0000

**Comenity  
Bank/Peebles**

Po Box 182789

Columbus, OH  
43218-0000

**Comenity  
Bank/Vctrssec**

Po Box 182789  
Columbus, OH  
43218-0000

**Commonwealth  
Anesthesia Assoc.**

P.O. Box 35808  
Richmond, VA  
23235-0000

**Commonwealth Lab  
Consultants**

Post Office Box  
36559  
Richmond, VA  
23235-0000

**Commonwealth  
Radiology**

1508 William Lawn  
Drive  
Suite 117  
Richmond, VA  
23230-0000

**CoventryOne**

P.O. Box 31210  
Tampa, FL 33631-  
0000

**Credit Adjustment  
Bo**

306 East Grace Street  
Richmond, VA  
23219-0000

**Credit Adjustment  
Board**

306 East Grace Street  
Richmond, VA  
23219-0000

**Credit Adjustment  
Board, Inc.**

8002 Discovery Dr.  
Ste. 311  
Richmond, VA  
23229-0000

**Credit Protection  
Asso**

13355 Noel Rd Ste  
2100  
Dallas, TX 75240-  
0000

**Darleene A. Hicks**  
6378 Manassas Drive  
Chesterfield, VA  
23832-0000

**David Lunger**

4157 Chain Bridge  
Rd  
Fairfax, VA 22030-  
0000

**Direct Path**

13355 Noel Rd Ste  
2100  
Dallas, TX 75240-  
0000

**Discover Bank**

P.O. Box 3025  
New Albany, OH  
43054-0000

**District 19 Com  
Services Board**

20 W. Bank Street  
Suite 2  
Petersburg, VA  
23803-0000

**Dominion  
Endodontics**

6037 Harbour Park  
Dr.  
Midlothian, VA  
23112-0000

**Dominion Law**

**Associates**

P.O. Box 62719  
Virginia Beach, VA  
23462-0000

**Dominion VA  
Power**

P.O. Box 26543  
Richmond, VA  
23290-0001

**Dr. Mark Pinsky**  
3333 S. Crater Rd.  
Petersburg, VA  
23805-0000

**Dr. Russell Handy**  
5875 Bremo Road  
Suite G-5  
Richmond, VA  
23226-0000

**eCast Settlement  
Corp.**

P.O. Box 29262  
New York, NY  
10087-0000

**Emergency  
Coverage Corp.**

P.O. Box 5406  
Cincinnati, OH  
45273-0000

**Emergency Medical  
Services**

P.O. Box 1658  
Chesterfield, VA  
23832-0000

**Emergency  
Physicians**

Immediate Care  
Center  
P.O. Box 6341  
Richmond, VA  
23230-0000

**Female Pelvic**

**Medicine**

Institute of VA  
1401 Johnston Willis  
Dr. #1100  
Richmond, VA  
23235-0000

**Fia Csna**

P.O. Box 17054  
Wilmington, DE  
19884-0000

**Fingerhut**

11 McLeland Road  
Post Office Box 2900  
Saint Cloud, MN  
56395-0000

**Florida Cardiology,  
PA**

P.O. Box 534405  
Atlanta, GA 30353-  
0000

**Florida Hospital  
Medical Group**

P.O. Box 538600  
Orlando, FL 32853-  
0000

**Floyd P. Goode**

6378 Manassas Drive  
Chesterfield, VA  
23832-0000

**Focused Recovery  
Solution**

9701 Metropolitan Ct  
Suite B  
Richmond, VA  
23236-3662

**Fort Lee Federal  
Credit Union**

4495 Crossings Blvd  
Prince George, VA  
23875-0000

**Fredricksburg**

**Credit Bureau**

10506 Wakeman  
Drive  
Fredericksburg, VA  
22407-0000

**Gastrointestinal  
Specialists**

2369 Staples Mill  
Road  
2nd Floor  
Richmond, VA  
23230-0000

**Genes Appliance**

P.O. Box 2608  
Chester, VA 23831-  
0000

**H&K Enterprise**

P.O. Box 278  
Paris, TN 38242-0000

**Harris & Harris  
Ltd**

111 W Jackson Blvd  
S-400  
Chicago, IL 60604-  
0000

**Healthcare Revenue  
Recovery Gr**

P.O. Box 459080  
Fort Lauderdale, FL  
33345-0000

**Home Choice  
Partners**

P.O. Box 416915  
Boston, MA 02241-  
0000

**Hopewell Medical  
Center**

815 W. Poythress  
Street  
Hopewell, VA 23860-  
0000

**Horizon Financial Management**

8585 S. Broadway  
Suite 880  
Merrillville, IN  
46410-0000

**HRRG**

P.O. Box 459080  
Sunrise, FL 33345-0000

**Ibo Credit Services**

1100 Charles Ave Ste.  
200  
Dunbar, WV 25064-0000

**James D. Bates, Jr.**

P.O. Box 65  
Oilville, VA 23129-0000

**James D. Bates, Jr.**

c/o Carl C. Muzi  
7601 Midlothian  
Turnpike  
N. Chesterfield, VA  
23235-0000

**James River Hospitalist Group**

P.O. Box 660827  
Dallas, TX 75266-0000

**JLR Anesthesia Associates**

P.O. Box 948075  
Maitland, FL 32794-0000

**John Randolph Hospital**

Post Office Box  
13620  
Richmond, VA  
23225-0000

**John Randolph Medical Center**

Resurgent Capital  
Services  
PO Box 1927  
Greenville, SC 29602

**JpMorgan Chase Bank**

3415 Vision Drive  
Columbus, OH  
43219-0000

**Lab Corp**

P.O. Box 2240  
Burlington, NC  
27216-0000

**Law Office of George Gusses**

33 S. Huron St.  
Toledo, OH 43604-0000

**Lee Memorial Health Systems**

**Linebarger Goggan Blair &**

Sampson, LLC  
4828 Loop Central  
Dr. #600  
Houston, TX 77002-0000

**Mary View Medical Center**

1701 High Street  
Portsmouth, VA  
23704-0000

**Mary View Medical Hospital**

3429 Regal Drive  
Alcoa, TN 37701-0000

**MCV Hospital**

P.O. Box 758721

Baltimore, MD

21275-0000

**MCV Hospitals**

P.O. Box 980462  
Richmond, VA  
23298-0000

**MCV Physicians**

P.O. Box 91747  
Richmond, VA  
23291-0000

**MCV Physicians**

PO Box 91747  
Richmond, VA  
23291-0000

**Mcydsnb**

9111 Duke Blvd  
Mason, OH 45040-0000

**Medical Center Radiologist, In**

P.O. Box 37  
Indianapolis, IN  
46206-0000

**Medical Transport LLC**

P.O. Box 2841  
Norfolk, VA 23501-0000

**Medicine Institute of Virginia**

1401 Johnston Willis  
Dr.  
Ste 1100  
Richmond, VA  
23235-0000

**Merchants Association**

Collection Division  
P.O. Box 1233  
Winter Haven, FL  
33880-0000

**MHNet Specialty Services**

P.O. Box 209010  
Austin, TX 78720-0000

**MiraMed Revenue Group**

255 W. Michigan Ave.  
Jackson, MI 49201-0000

**Nationwide Credit Corporation**

P. O. Box 1022  
Wixom, MI 48393-0000

**One Hampton Medical**

3475 Momentum Place  
Chicago, IL 60689-0000

**Outsourcing LLC**

P.O. Box 549  
Lutherville  
Timonium, MD  
21094-0000

**Parrish & Lebar**

Five East Franklin Street  
Richmond, VA  
23219-0000

**Parrish & Lebar LLP**

5 East Franklin Street  
Richmond, VA  
23219-0000

**Partners FCU**

c/o Edward S.  
Whitlock, III  
10160 Staples Mill

Rd. Ste 105  
Glen Allen, VA  
23060-0000

**PASI**

P.O. Box 188  
Brentwood, TN  
37024-0188

**Patient First**

5000 Cox Road  
Suite 100  
Glen Allen, VA  
23060-0000

**Patient First**

P. O. Box 8630  
Richmond, VA  
23226-0000

**Patient First**

P.O. Box 758941  
Baltimore, MD  
21275-8941

**Pocahontas 895**

P.O. Box 7693  
Richmond, VA  
23231-0000

**Portfolio Recovery Associates**

P.O. Box 12914  
Norfolk, VA 23541-0000

**Portsmouth Fire & Rescue**

P.O. Box 758941  
Baltimore, MD  
21275-0000

**Prime Rate Premium Finance**

P.O. Box 100507  
Columbia, SC 29201-0000

**Professional**

**Emergency Care**

P.O. Box 3475  
Toledo, OH 43607-0000

**Radiology Spc. of Florida**

P.O. Box 264552  
Orlando, FL 32886-0000

**Rafael Amay**

6378 Manassas Drive  
Chesterfield, VA  
23832-0000

**RBH Medical Clinic**

Raphael Agada, MD  
3611 Boulevard  
Colonial Heights, VA  
23834-0000

**Receivable Management**

7206 Hull Street Rd  
Ste  
North Chesterfield,  
VA 23235-0000

**Receivable Management**

7206 Hull Street Rd  
Ste 211  
Richmond, VA  
23235-0000

**Receivable Management**

7206 Hull Street Rd  
Ste  
Richmond, VA  
23235-0000

**Receivables Management Systems**

P.O. Box 8630  
Richmond, VA

23226-0630

**Remax Allegiance**  
4157 Chain Bridge  
Rd.  
Fairfax, VA 22030-  
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**Richmond Gastro  
Assocs.**  
P.O. Box 14000  
Belfast, ME 04915-  
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**Richmond Health  
System**  
P. O. Box 11302  
Richmond, VA  
23230-1302

**Richmond Infectious  
Disease**  
1370 St. Francis  
Blvd.  
Suite 505  
Midlothian, VA  
23114-0000

**Rivers Bend  
Hospitals**  
3611 Boulevard  
Colonial Heights, VA  
23834-0000

**Rjm Acq Llc**  
575 Underhill Blvd  
Ste 224  
Syosset, NY 11791-  
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**ROI Receivables**  
1920 Greenspring Dr.  
Ste. 200  
Lutherville  
Timonium, MD  
21093-0000

**Russell Handy, MD**  
5875 Bremo Road

Suite 701  
Richmond, VA  
23226-0000

**Sears/Cbna**  
133200 Smith Rd  
Cleveland, OH  
44130-0000

**Sentry Early  
Warning Systems**  
c/o Caudle & Caudle  
PC  
3123 West Broad St.  
Richmond, VA  
23230-0000

**Servpro of  
Chesterfield**  
523 Branchway Road  
Richmond, VA  
23236-0000

**Servpro of  
Chesterfield**  
12001 Deerhill Road  
Midlothian, VA  
23112-0000

**Servpro of  
ChesterfieldRegAge  
n**  
A. Donald Ford Jr.  
2727 Buford Rd. Ste.  
A  
Richmond, VA  
23235-0000

**Shirley L. Hennessy-  
Reveley**  
Hennessy-Reveley &  
Associates  
10305 Memory Lane,  
Suite 102  
Chesterfield, VA  
23832-0000

**Solstas Lab**

**Partners**  
P.O. Box 830740  
Birmingham, AL  
35283-0000

**Southside Regional  
Medical Cen**  
200 Medical Park  
Boulevard  
Petersburg, VA  
23805-0000

**Spinella, Owings &  
Shaia**  
8550 Mayland Drive  
Richmond, VA  
23294-4704

**Sprint**  
Attn: Bankruptcy  
Dept  
P.O. Box 3326  
Englewood, CO  
80155-0000

**St. Francis Medical  
Center**  
P.O Box 28538  
Henrico, VA 23228-  
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**Stanley Holmes**  
P.O. Box 732  
Chesterfield, VA  
23832-0000

**Steam Rite Carpet**  
306 East Grace Street  
Richmond, VA  
23219-0000

**Stephen E.  
Dickerson**  
Central VA Legal Aid  
Society  
Richmond, VA  
23220-0000

**Steven Castro, DDS,**

**PC**

2930 West Hundred Rd.  
Chester, VA 23831-0000

**Summit HealthCare**

1 Park West Circle  
#202  
Midlothian, VA  
23114-0000

**Syncb/Belk**

Po Box 965028  
Orlando, FL 32896-0000

**Syncb/Jcp**

Po Box 965007  
Orlando, FL 32896-0000

**Syncb/Lowes**

Po Box 965005  
Orlando, FL 32896-0000

**Synter Resource Group, LLC**

5395 Rivers Ave. Ste. 102  
Charleston, SC  
29406-6000

**Target Nb**

Po Box 673  
Minneapolis, MN  
55440-0000

**Thoracic Surgery Assoc.**

P.O. Box 843356  
Boston, MA 02284-0000

**Thoracic Surgery PC**

P. O. Box 14005  
Richmond, VA

23225-0000

**Tonja C. Smith**

**Transworld Sys Inc/38**

507 Prudential Rd  
Horsham, PA 19044-0000

**Treasurer**

**Chesterfield County**  
PO Box 70  
Chesterfield VA  
23832

**United Consumers**

P.O. Box 4466  
Woodbridge, VA  
22194-4466

**Urgent Care Northwest**

2708 Easy Hwy 78  
Jasper, AL 35501-0000

**Va Credit Union**

7500 Boulders View Drive  
Richmond, VA  
23225-0000

**VCU Health Systems**

P.O. Box 980462  
Richmond, VA  
23298-0462

**Violation Processing Center**

P.O. Box 1234  
Clifton Forge, VA  
24422-0000

**Virginia Credit Union**

P. O. Box 90010  
Richmond, VA

23225-0000

**Virginia Credit Union Reg. Agt**

Jane G. Watkins  
P.O. Box 90010  
Richmond, VA  
23225-9010

**Virginia Credit Union, Inc.**

PO Box 90010  
Richmond, VA 23225

**Virginia South Psychiatric**

& Family Services,  
PC  
269 Medical Park Blvd.  
Petersburg, VA 23805-0000

**Virginia Tech Veterinary Med**

800 Washington Street SW  
Blacksburg, VA  
24061-0000

**Web Listings, Inc.**

1623 Military Road  
#926  
Niagara Falls, NY  
14304-0000

**William & Fudge**

P.O. Box 266  
Rock Hill, SC 29731-0000

**Williams & Fudge, Inc.**

P.O. Box 11590  
Rock Hill, SC 29731-0000

**Women's Surgery Center**

Creditor  
committee *Entity*

2755 S Federal Hwy  
Boynton Beach, FL  
33435-0000

**Yellow Pages United**  
P.O. Box 53282  
Atlanta, GA 30355-

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